

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF MARYLAND
at Greenbelt

IN RE: Lawrence Peter Shombert : Case No. 24-15368

: Chapter 13

THE BANK OF NEW YORK MELLON
F/K/A THE BANK OF NEW YORK AS
TRUSTEE FOR FIRST HORIZON
MORTGAGE PASS-THROUGH TRUST
2006-AR2

:

:

Movant

:

v.

:

LAWRENCE PETER SHOMBERT
203 PRETTYMAN DRIVE
ROCKVILLE, MD 20850

:

:

Debtor

:

REBECCA A. HERR
185 ADMIRAL COCHRANE DR., SUITE 240
ANNAPOLIS, MD 21401

:

:

Trustee

:

ANSWER TO OBJECTION TO CONFIRMATION

Lawrence Peter Shombert, Debtor, by and through her attorney, Donald S.


Goldbloom, in Answer to the Objection to Confirmation states the following:

1. The Debtor recognizes the deficiency in pre-petition arrears being incorporated into the plan, and intends to amend the plan incorporating solutions to this deficiency

along with others that may be raised by other creditors before the confirmation hearing and if not sufficient will ask for leave to amend.

2. The valuation was figured upon a value halfway between the Zillow valuation and that of the State Department of Assessments and Taxation.
3. The Debtor intends to rectify any deficiencies to the best of his ability and as this case develops the evidence should show that the Debtor is not acting in bad faith.

WHEREFORE, the Debtor requests that this court allow Debtor leave to amend, amalgamating all filed objections before simultaneously as this case proceeds towards the confirmation process and for such further relief as the nature of this case shall require.



/s/ Donald S. Goldbloom, Esq.

Donald S. Goldbloom, Esq. #02057

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of July 2024, a copy of the above referenced motion was sent electronically by ECF or mailed first class, postage prepaid to:

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